



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

  
1085224 - R8 SDMS

DEC 14 1998

Mr. Toby Ross  
City Manager  
Park City Municipal Corporation  
445 Marsac Avenue  
PO Box 1480  
Park City, UT 84060-1480

Dear Mr. Ross:

This letter is intended to provide Park City an update and summary of EPA's activities in the Park City area and also to offer some suggestions on how we can continue to move forward. With the increasing development in the area and the approach of the 2002 Olympics, it seems there is an excellent opportunity for finally providing closure on many of the issues we have collectively dealt with in the past and to begin laying the ground work for any issues we may encounter in the future.

As you are aware, there are a number of sites which EPA and the Utah Department of Environmental Quality (UDEQ) have investigated in the area. Some sites, such as Richardson Flats and, to a lesser degree, Prospector Square, have not been completely dealt with. The Prospector Square Ordinance (PSO) has been applied for some sites and is being considered by Park City for application at others. In the past, we have handled sites in the area somewhat piecemeal with little continuity to the area as a whole. This has led to unanswered questions and, sometimes, inconsistent approaches. In addition, new sites in and around Park City are being screened individually as they arise, which further complicates the situation.

A different approach would be - to the greatest extent possible - to address the Silver Creek watershed as a whole. This does not mean making the area a "giant Superfund site" or anything of that nature. It does mean developing a comprehensive plan to address all of the potential environmental and health impacts in the area in a consistent, thorough manner. A key component would be EPA verification that the PSO is effective and acceptable to EPA as a remedy for the area to which it has been applied - with no caveats. The eventual goal of such a plan would be to address any risk to human health or the environment, give Park City a "clean bill of health," and limit EPA's involvement in the area.

A "watershed approach" such as this often triggers concern in the public and private sectors. Many believe such an approach takes away the flexibility to address sites individually, overextends resources, leads to investigations where there is no indication of a problem, and unnecessarily magnifies the scope of regulatory agency involvement. In fact, the approach generally accomplishes just the opposite. Addressing the area as a whole provides many benefits:

- Allows us to see the "big picture" rather than inferring what effects isolated areas are causing. This helps to eliminate guesswork and "worst case scenario" approaches to environmental investigation and cleanup.



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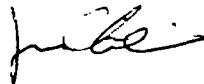
- Allows everyone to focus resources in the areas causing the greatest impact and still address individual sites creatively and through different means, often as a part of other initiatives in the area.
- Provides a workgroup and a set framework for making decisions in an area, which simplifies and quickens future responses and allows for participation by all stakeholders. Such a workgroup and framework can be tailored to meet the specific needs and goals of an area and helps provide consistency, continuity, and more finality.
- Allows a great deal of involvement and self-determination for the localities involved.

What would this mean for Park City? It would not mean radical changes from how we have done business in the past. However, it would necessitate a willingness on the part of the City and the regulated community to work closely with EPA and the UDEQ to finally put some issues to rest. Everyone may have to be somewhat flexible. By going a little farther than we have in the past, we can eliminate many of the questions which are dictating EPA's continuing involvement, eliminate or reduce any stigma associated with environmental concerns, and have positive effects on public health and the environment in the Park City area. Some of this can be done relatively quickly.

EPA is committed to moving ahead in Park City. We would like to begin a dialogue between the City, the State, and other stakeholders which hopefully will lead to a fair, safe, and comprehensive plan to address environmental concerns in the area. Rather than placing the burden and responsibility on any one agency for developing such a plan, we would like to develop this plan as a group, ensuring everyone's concerns are voiced and taken into consideration. This will also ensure that everyone's "piece" makes sense when viewed as part of the whole and will limit the impact on the Park City community and its resources during this challenging time. We suggest an initial meeting between EPA, UDEQ, and the City to begin discussing the issues and determine if the approach is agreeable. As a first step, EPA will present a synopsis of issues which are most crucial from our perspective and also some ideas for dealing with these issues. We would also be interested in receiving an update from Park City on potential development in the area, including the Marsac Mill Site and the Empire Canyon area.

Please contact me at (303) 312-6748 as soon as possible so we can discuss such a meeting. I look forward to your reply.

Sincerely,



Jim Christiansen  
Remedial Project Manager

cc: Jodi Hoffman, City Attorney, Park City Municipal Corporation, 445 Marsac Avenue, PO Box 1480, Park City, UT 84060-1480  
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